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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: October 31, 1991

SUBJECT: BTAG Minutes and Recommendations-Meeting October 24, 1991
Ecological Assessment - Roy F. Westion version
American Chemical Services (ACS), IN

FROM: Eileen Helmer, Ecologist
Superfund Technical Support Unit

TO: Wayde Hartwick, RPM
IL/IN Section

The Biological Technical Assistance Group (BTAG) reviewed and discussed the above mentioned report during a meeting and conference call held October 24, 1991. Below are comments which resulted from the meeting.

Page 1-1, line 2 - delete "impacts" - no biological sampling was conducted to document impacts.

paragraph 2, line 6 - ground water is an additional source of water to the wetlands at ACS.

paragraph 4, line 9 - only BTAG members visited the site: Environmental Response Team representative Dave Charters, and from U.S. Fish and Wildlife Service (FWS), Dan Sparks.

Page 1-2, § 1.2.2 and §1.2.4 - The FWS wetland delineation report should be cited directly rather than from the Warzyn report.

§ 1.2.3 - Inactive portions of the landfill with soil cover provide wildlife habitat and should not be excluded from ecological assessment.

Page 1-3 - Although the site is not designated as a special area in the Natural Heritage Program data base, threatened or endangered species or uniqui plant communities could still exist onsite. That data base is a growing data base listing known sensitive areas. Important unknown areas are likely to exist in the state. A reconnaisance survey by a trained biologist is necessary to determine whether sensitive species/communities are present.

Page 2-1, paragraph 2 - an inconsistency exists in that in line 2, wetland surface waters are said to have been sampled, while in paragraph 3 the text states they were not.

paragraph 4 - "Lowest Reported Toxic Concentrations" should be better-defined.

Page 2-5, paragraph 2 - If the Kapica Drum area is soil-covered and some vegetation exists there, the area is likely used by some species and should be considered habitat.

Page 2-6, Table 2-2 - Detection limits should replace the "ND" for analytes not detected.

Page 3-1, §§ 3 and 3.2 - Section 3 should be entitled "Indicator Species," since population-level studies are not being performed, and because the assessment only uses indicator species (all the populations are of concern, but we're not assessing them all). Section 3.2 should be combined with section 3.1.

paragraph 3 - in line 2, replace "the target aquatic" with "an appropriate indicator."

Page 4-1, line 1 - replace "target" with "indicator."

paragraph 1 - should be reworded to indicate the approach is "conservative" rather than "worst case."

paragraph 2, line 5 - the 1991 EPA report should not be cited because it is a draft document. Instead, call the author and cite the equasion as a personal communication.

Page 4-6, paragraph 2 - ingestion rates and body weights for laboratory rats should be changed to values applicable to a Microtus species.

Page 4-7, mink exposure assumptions - fish concentration should equal water contaminant concentration times BCF.

Page 4-4, Table 4-2 - The values listed for BAF and BCF should be discussed and revised per further discussion.

Page 4-8, mink ingestion - prey consumption should be greater than 15 g/day (perhaps 150 g/day).

Page 5-2, Table 5-1 - Sources should be cited for the safety factors used.

Page 5-5, mink PCB toxicity - the value 0.0015 mg/kg/day from Eisler, 1985 should actually be 0.0015 mg/kg body weight/day. The critical toxicity values in this table should be checked for accuracy, and an explanation offered as to how values are derived if different from the value cited in the reference.

Page 5-7, paragraph 4 - delete paragraph - these guidelines not applicable.

paragraph 5 - in line 2, replace "safe levels" with "criteria."

paragraph 6 - for those values in which equilibrium partitioning is used to calculate "SQCs", the values derived shoud not be referred to as sediment quality criteria.

Table 5-4 - The table should have consistent units, and the equilibrium partitioning numbers should not be called "sediment quality criteria." Also, "safe level" should be defined, or these columns should be called something else. Finally, the "SQC" calculation should use 0.5%TOC.

Table 5-5 - The "Background approach" column should be removed. Values could also be compared with the Ontario Ministry of the Environment Guidelines (as "benchmarks" only). In addition, the "ER-L" and "ER-M" values should be explained in more detail.

Table 6-1 - The total hazard index value should be removed since this is not a human health risk assessment. Simply highlight those HI values greater than 1.

Page 6-3, Section 6-3 - define "safe level."

Table 6-2 - The shallow ground water contaminant concentrations should be used for the surface water maximum detected concentration in these calculations.

Page 7-1, 2nd paragraph - This paragraph should be deleted.

Finally, we would like to discuss all of the risk calculations with the authors of this report to claify exactly how the calculations were done, and which values were used.

If you have any questions or need any additional information, please do not hesitate to contact me at 6-4828. Also, please complete the attached critique sheet and return it to Steve Ostrodka (Mail Code 5HSM-TUB7).

cc: BTAG members